



August 1, 2013

EX PARTE NOTICE

Via Electronic Filing
Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Improving 9-1-1 Reliability, PS Docket. No. 13-75; Reliability and Continuity of Communications Networks, Including Broadband Technologies, PS Docket No. 11-60

Dear Ms. Dortch:

Pursuant to Section 1.1206(b) of the Commission's rules, this letter will confirm that on Tuesday, July 30, 2013, the undersigned and Stephen Meer, Craig Donaldson and Mike DeWeese of Intrado Inc. (Intrado), met with Lauren Kravetz, John Healy, Michael Connelly, and Eric Schmidt of the Public Safety and Homeland Security Bureau.

The purpose the meeting was for Intrado to provide information to assist the Commission in promulgating 911 reliability and resiliency rules that take into consideration how NG911 networks are provisioned. To that end, Intrado explained the role of its CLEC subsidiary, Intrado Communications Inc., as a provider of NG911 services to Public Safety Answering Points (PSAPs) and how its advanced next generation network differs in some relevant respects from that of legacy 911 service providers.

With respect to the Commission's inquiry as to the appropriate means of ensuring 911 circuit diversity, Intrado explained that in contrast to legacy ILEC providers that own and control the transport facilities over which 911 calls and data are transported, Intrado procures transport services for the delivery of 911 calls and for ALI/ANI from third party transport providers. In designing its network and procuring third-party transport services, Intrado places the highest priority on circuit diversity, and the majority of its network is implemented through diverse physical links. Whenever, possible, that diversity is obtained by procuring diverse paths through separate carriers. However, because Intrado does not control the underlying network over which its calls and data are transported it cannot physically monitor the circuits on these networks at any given point in time. While Intrado performs routine investigations to ensure continued diversity, it has encountered circumstances where, subsequent to an initial deployment and unbeknown to Intrado, the underlying carriers with whom Intrado has placed different circuits have combined routes so that the path Intrado



believed was diverse was no longer diverse. Such occasions have been the cause of actual outages in the past. Intrado suggested that if the Commission were to require physical circuit auditing, in order for Intrado to comply, it would have to require the underlying transport providers to provide Intrado with tools to perform those audits. Intrado asked the Commission to keep in mind that the cost of providing such a level of 911 reliability would ultimately be borne by PSAPs, many of which are not expending funds to obtain diversity with respect to the 911 call paths they procure today. Intrado reiterated the point that it has made in the past—that PSAP lack of diversity constitutes a significant weak link in the nation’s 911 system. Finally, Intrado explained that its concerns regarding physical audits of 911 circuit diversity are applicable to the deployment of diverse monitoring links and aggregation points.

In discussing the Commission’s intent to obtain 911 service provider compliance with industry Best Practices, Intrado explained that it has been an active participant in developing CSRIC (and NRIC) Best Practices, but that further work is needed to ensure that the Best Practices are applicable to NG911.

With respect to the Commission’s inquiry as to the appropriate method of ensuring sufficient back up power at central offices, Intrado explained that, in contrast to legacy environments in which switches are housed in ILEC owned centers, the critical infrastructure of Intrado’s network is diverse and dispersed over multiple locations—and some of those locations are commercial data centers which Intrado does not control. For example, in order to serve PSAP customers, Intrado places gateways in regional commercial data centers. It always chooses data centers that meet the highest commercial standards available in the location and requires redundant power sources for its equipment. Intrado also places back up power sources in its data center space to directly support its equipment. However, Intrado and other non-legacy 911 service providers may be commercially precluded from securing commitments from data centers in order to implement standards imposed by the Commission if those standards are outside the realm of what is offered to other data center customers.

Intrado also discussed the Commission’s proposed changes to the PSAP notification requirements of its Part 4 rules. Intrado understands the need to provide PSAPs notification of outages affecting them. However, the Commission should consider whether, on balance, the quicker notification and the additional information mandated by the proposed rules will create better management of 911 outages. Complete and accurate information about the nature of the outage—cause, breadth, severity, duration—may not be immediately known. For example, providing an unreliable estimated restoration time may trigger unnecessary or even harmful PSAP actions or may further complicate the restoration process. Further, PSAPs might be compelled to make public statements in an effort to mitigate the affect of an outage on the public. However, if they do so on the basis of incomplete root cause investigations, the information may result in more harm to the public than good. When



public safety has to retract or alter its public statements, overtime, the public may become less attentive to the public announcements. It is in the public's best interest for 911 service providers to be given sufficient time to provide detailed outage information to the affected PSAP(s).

Flexibility with respect to the time and content of PSAP notification is especially important where the outage affects multiple PSAPs. In the event of an outage, the priority should be to resolve the outage as quickly as possible. While providing service provider contact information would be appropriate, providers may have their dedicated resources working on restoration activities and might not be able to provide real time communications to multiple PSAPs. Intrado appreciates Verizon's method of hosting a conference call as a prudent method of addressing the outage, but specific communication methods should not be mandated by the rules.

Furthermore, the Commission should consider whether all entities that may be subject to the PSAP notification rule would have access to information relevant to PSAPs' ability to react to outages. Some providers, such as wireless or VoIP originating providers or providers that provide network or services to covered entities may experience an outage that prevents 911 calls to be made; however, because those providers do not have knowledge of the location of any specific 911 calls at that juncture, those entities may not know which PSAPs would have been affected and there would be nothing that the PSAP could do with respect to the outage in any event.

Please contact me if you have any questions.

Sincerely,

/s/

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cc: Lauren Kravetz
John Healy
Michael Connelly
Eric Schmidt